

## REMARKS

In the July 17, 2002, Office Action, claims 8-78 were rejected as being based upon a defective reissue declaration under 35 U.S.C. § 251. The Examiner objected to the Declaration because it failed to specifically identify at least one error being corrected in the reissue. The Examiner took the position that the error identified in paragraph 7 of the Reissue Application Declaration of Michel Gondouin was not specific enough.

Applicant has submitted with this Amendment the Supplemental Reissue Declaration of Michel Gondouin. The Supplemental Reissue Declaration specifically identifies in paragraph 7 at least one error being corrected. In particular, the Declaration identifies as an error that Applicant's patent protection need not be limited to an apparatus that includes a hydraulically-operated slot-cutting tool for selectively perforating the drainhole liner as claimed in independent claims 1, 2, and 3, or to a method including selectively perforating the uncemented lower part of the coiled tubing liner in situ using a hydraulically-operated slot-cutting tool as claimed in independent claim 7. The Declaration further states that these elements are not required in claims 8-78. Accordingly, the Supplemental Reissue Declaration satisfies 35 U.S.C. § 251 and 37 C.F.R. § 1.175(a), and Applicants respectfully request that the rejection based on a defective Declaration be withdrawn. And because the Examiner acknowledged that the prior art does not disclose or render obvious the claimed method, Applicant believes the claims are in condition for allowance.

Further, in the July 17, 2002, Office Action, the Examiner identified a typographical error in the specification, which has been corrected by way of this Amendment. In addition, the Examiner approved the proposed drawing changes filed on April 4, 2001, and requested that Applicant submit corrected drawings. Accordingly, Applicant files herewith a Submission of Formal Drawings, which includes the changes to Figs. 3, 4, 6, and 10 approved by the Examiner.

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Finally, Applicant submits a copy of "Exhibit O" from the Information Disclosure Statement filed April 4, 2002. At the request of the Examiner, on June 27, 2002, Applicant had provided, copies of the references cited in the Information Disclosure Statement, which had previously been submitted in the parent reissue application. The Examiner indicated in the outstanding Office Action that Exhibit O was inadvertently omitted from the materials he received. Accordingly, a copy of Exhibit O, which is the Natural Reserves Group, Inc. v. Baker Hughes, Inc., 96-31380, docket sheet, is provided with this Amendment.

In view of the foregoing amendments and remarks, Applicant respectfully requests the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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By: 

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